

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE  
PLAYERS' CONCUSSION INJURY  
LITIGATION

Case No. 2:12-md-02323-AB

MDL No. 2323

The Honorable Anita B. Brody

Kevin Turner and Shawn Wooden, on behalf of  
themselves and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties  
LLC, successor-in-interest to NFL Properties,  
Inc.,

Defendants.

THIS DOCUMENT RELATES TO: ALL  
ACTIONS

**REPLY IN SUPPORT OF  
MOTION OF WALKER PRESTON CAPITAL HOLDINGS, LLC  
TO INTERVENE FOR THE LIMITED PURPOSE OF OPPOSING  
ON JURISDICTIONAL GROUNDS CO-LEAD CLASS COUNSEL'S MOTION  
TO (1) DIRECT CLAIMS ADMINISTRATOR TO WITHHOLD ANY PORTIONS  
OF CLASS MEMBER MONETARY AWARDS PURPORTEDLY OWED TO CERTAIN  
THIRD-PARTY LENDERS AND CLAIMS SERVICES PROVIDERS, AND (2) DIRECT  
DISCLOSURE TO CLAIMS ADMINISTRATOR OF EXISTENCE OF CLASS  
MEMBER AGREEMENTS WITH ALL THIRD PARTIES (ECF NO. 8470)**

Proposed Intervenor, Walker Preston Capital Holdings, LLC ("Walker Preston") moved, pursuant to Federal Rule of Civil Procedure 24(a), to intervene in this matter for the limited purpose of opposing on jurisdictional grounds co-lead class counsel's motion (ECF No. 8470) which sought, in part, an Order directing the Claims Administrator to withhold any portions of class member monetary awards purportedly owed by class members to certain third-party lenders

(including funders and so-called asset purchasers) and claims services providers (the “Motion to Withhold Funds”). (*See* ECF 8932).

The deadline for co-lead class counsel to oppose Walker Preston’s Motion to Intervene has passed, and co-lead class counsel did not file an opposition. Further, in co-lead class counsel’s reply in support of its Motion to Withhold Funds, co-lead class counsel noted that it would “not address the intervention motions, but rather, only those respondents’ [Walker Preston, Cash4Cases, and Atlas] underlying substantive responses.” (ECF 9113 at 2 n.1). Further, in light of this Court’s December 8, 2017 Order (ECF 9517), which could affect Walker Preston’s rights, it is important that Walker Preston’s status as an intervenor is resolved.

Accordingly, because Walker Preston’s Motion to Intervene was unopposed, and for the reasons set forth in Walker Preston’s opening motion and memorandum of law, Walker Preston respectfully requests (1) this Court grant Walker Preston’s motion to intervene for the limited purpose of challenging co-lead class counsel’s motion on jurisdictional grounds and (2) treat Walker Preston’s proposed response to the Motion to Withhold Funds as filed on November 16, 2017.

Dated: December 11, 2017

Respectfully submitted,

By: s/ Lee M. Epstein

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